UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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BRIAN REAVES,   :   Civil Action No. 05-10804 (MEL)
                                                           :
                          Plaintiff,   :
                                                           :
      - against -   :
                                                           :
MFS SERIES TRUST I, MFS SERIES TRUST II,   :
MFS SERIES TRUST IV, MFS SERIES TRUST V,   :
MFS SERIES TRUST IX, MFS SERIES TRUST X,   :
MFS GOVERNMENT SECURITIES FUND,   :
MASSACHUSETTS INVESTORS TRUST, and   :
MASSACHUSETTS INVESTORS GROWTH   :
FUND,   :
                                                           :
                          Defendants.   :

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MOTION TO REMAND

Pursuant to 28 U.S.C. §1447(c) and 15 U.S.C. §§77p(d)(4) & 78bb(f)(3)(D), Plaintiff

Brian Reaves hereby moves this Court for an order remanding this action, which is solely based on

state law breach of contract law against Defendants, to the Suffolk County Superior Court, and

awarding Plaintiff "just costs and … actual expenses, including attorney fees, incurred as a result of

the removal."

Plaintiff makes this motion based on the complaint, the memorandum of law

submitted contemporaneously herewith, and all other pleadings and orders in this action.

REQUEST FOR ORAL ARGUMENT

Plaintiff believes that oral argument may assist the Court in making its determination

on this motion. Accordingly, pursuant to Local Rule 7.1(d), Plaintiff hereby requests the Court

schedule a hearing for oral argument on this motion.

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

Undersigned counsel certify that they have conferred with counsel for defendants in

a good faith effort to resolve or narrow the issues raised by this motion, but have been unable to do

so.

Dated: June 6, 2005

Respectfully submitted,

By:/s/ John C. Martland

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